

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOSEPH KUZMIN,	)	
	)	Case No. 14 CV 09418
Plaintiff,	)	
	)	JUDGE DURKIN
vs.	)	
	)	Magistrate Judge Kim
DETECTIVE NARI ISAKSON, OFFICER	)	
MCHUGH, DETECTIVE DESALVO and the	)	
CITY OF CHICAGO,	)	
	)	
Defendants.	)	

**DEFENDANTS HARO AND DESALVO’S MOTION TO COMPEL  
PLAINTIFF’S RESPONSES TO WRITTEN DISCOVERY**

Defendants Isakson (AKA Haro) and DeSalvo (collectively “Defendants”), by and through one of their attorneys of record, Kristin M. Pinkston, Assistant Corporation Counsel of the City of Chicago, request this Honorable Court compel Plaintiff Joseph Kuzmin to respond to written discovery propounded on him by Defendants Haro and DeSalvo on May 22, 2015, and, in support of their motion, state the following:

1. Plaintiff filed this lawsuit on or about November 24, 2014. Dkt. No. 1.
2. On May 22, 2015, Defendant Haro, by and through one of her attorneys, propounded written discovery on Plaintiff. *See* Defendant Haro’s First Set of Interrogatories to Plaintiff Kuzmin, Defendant DeSalvo’s First Set of Interrogatories, Defendant DeSalvo’s First Set of Requests to Produce to Plaintiff Joseph Kuzmin, attached as Exhibit A.

3. The written discovery propounded on Plaintiff was delivered via hard copy and by email. Receipt of the email with the attached discovery was confirmed by Plaintiff. *See* email correspondence dated May 22 – 23, 2015, attached as Exhibit B.
4. On or about June 16, 2015, former Assistant Corporation Counsel Kristin Acuff communicated with Plaintiff's counsel Scott Kamin regarding both parties' respective needs for additional time to respond to written discovery. It is the understanding of undersigned counsel that an agreement for an extension of time for both parties' respective responses was reached for early July 2015.
5. On Monday, July 13, 2015, counsel for Defendants Kristin M. Pinkston and Julian Johnson spoke with Scott Kamin regarding the outstanding written discovery. Parties agreed that Plaintiff would have until July 21, 2015 to tender his discovery responses. *See* email correspondence dated August 17, 2015, attached as Exhibit C.
6. On Monday, August 17, 2015, via electronic correspondence, undersigned counsel once again communicated with Plaintiff's counsel, Scott Kamin, regarding Plaintiff's outstanding discovery. Ex. C.
7. The next day, Tuesday, August 18, 2015, undersigned counsel and Plaintiff's counsel, Scott Kamin, spoke via telephone regarding the outstanding discovery. *See* email correspondence dated August 18, 2015, attached as Exhibit D. Plaintiff's counsel stated that he was in communication with his client regarding the outstanding discovery responses and that he expected to have the completed responses in his possession by August 21, 2015. *Id.*
8. To date, Defendants have not received any responses from Plaintiff to the written discovery issued by Defendants on May 22, 2015.

9. Discovery in this matter closes on November 20, 2015.
10. Defendants are significantly prejudiced by Plaintiff delay because the information and documents requested are necessary to continue discovery in this matter, including deposing Plaintiff and other material witnesses.

WHEREFORE, Defendants Haro and DeSalvo respectfully request this Court order Plaintiff to answer the written discovery issued on May 22, 2015.

Respectfully submitted,

/s/ Kristin M. Pinkston  
Kristin M. Pinkston  
Assistant Corporation Counsel  
Federal Civil Rights Litigation Division  
30 N. LaSalle, Suite 900  
Chicago, Illinois 60602  
312.744.9212 (T)  
312.744.6566 (F)  
kristin.pinkston@cityofchicago.org  
6297426